

UNITED STATES EASTERN DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CHARLES HADDAD,

Plaintiff,

vs.

Case No. 04-CV74932
Hon. Anna Diggs Taylor
Magistrate Judge Donald A. Scheer

INDIANA PACERS, an assumed name, a/k/a
PACERS BASKETBALL CORPORATION,
an Indiana Corporation, JERMAINE O'NEAL,
and ANTHONY JOHNSON,
Jointly and Severally,

Defendants.

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DEFENDANT JERMAINE O'NEAL'S PRELIMINARY EXHIBIT LIST

Defendant Jermaine O'Neal ("Defendant O'Neal"), by and through his attorneys
Dickinson Wright PLLC and Munger, Tolles & Olson LLP, states as follows for his Preliminary
Exhibit List:

Based upon information known to date, and reserving the right to supplement or modify this list, Defendant O'Neal provides notice that he may introduce at trial any of the exhibits identified or described below:

1. Any and all medical records of Plaintiff Charles Haddad.
2. Any and all documents maintained by the Palace of Auburn Hills that in any way relate or refer to Plaintiff and/or the events occurring at the conclusion of the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers.
3. Any and all documents maintained by the Palace of Auburn Hills with respect to Plaintiff's behavioral problems at Palace events.
4. The police report generated by the Auburn Hills Police Department.
5. Any and all video recordings of the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers, including all video recordings of the events giving rise to this dispute.
6. Any and all documents reviewed and/or relied upon by the Oakland County Prosecutor's Office in connection with the investigation of the events occurring at the conclusion of the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers.
7. Any and all witness statements describing the events occurring at the conclusion of the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers.
8. Any exhibits identified or offered in the parallel criminal proceedings, as well as all court transcripts.
9. Any exhibits identified or offered by any other party.
10. The parties' responses to written discovery requests.
11. Any exhibits identified or submitted in depositions after this Exhibit List is submitted to the Court.
12. All depositions and exhibits to depositions.

13. All documents produced by non-parties through discovery, including documents produced from subpoenas.

14. Any and all expert witness reports, files, notes and other documents.

15. Any documentary evidence necessary for rebuttal or impeachment.

16. Demonstrative and/or summary exhibits.

17. Defendant O'Neal reserves the right to amend or supplement this list as additional information becomes known during discovery or otherwise.

Respectfully Submitted,

DICKINSON WRIGHT PLLC

By: /s/ Richard M. Apkarian Jr.
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Dated: July 18, 2006

PROOF OF SERVICE

STATE OF MICHIGAN)
) SS.
COUNTY OF OAKLAND)

Richard M. Apkarian Jr., being first duly sworn, deposes and says that on the 18th day of July, 2006, he caused to be served a copy of Defendant Jermaine O'Neal's Preliminary Exhibit List, and this Proof of Service via electronically filing using the ECF system with the clerk of court who will send notice to Jason J. Thompson, Steven M. Potter, and Hideaki Sano.

/s/ Richard M. Apkarian

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